

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

RONNIE TOWNSEND, #121142

Plaintiff,

v.

CAPTAIN GEORGE EDWARD,  
SERGEANT JIMMY TAUNTON  
Defendants,

CV NO 2:06-CV-564-MHT

**AFFIDAVIT**

State of Alabama :

Elmore County :

Before me, the undersigned authority, a Notary Public in and for said County and State of Alabama at Large, personally appeared George Edwards, who being known to me and being by me first duly sworn, deposes and says on oath as follows:

My name is Jimmy Taunton. I am presently employed as a Correctional Officer II with the Alabama Department of Corrections at Staton Correctional Facility, P.O. Box 56, Elmore, Alabama 36025. I am over twenty-one years of age and have personal knowledge of the facts set forth below.

I have reviewed the complaint of Inmate Ronnie Townsend and this is my response to his complaint.

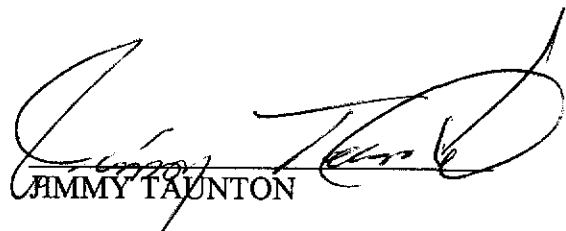
In this civil action, Inmate Townsend alleges that he was physically assaulted by Lieutenant Willie Copeland.

Inmate Ronnie Townsend was assigned to Staton's Farm Squad #12. Inmates assigned to Farm Squads are instructed to report to the Back Gate at 7:00 A.M. each morning whether their squads checks out or not. On May 24, 2004, Inmate Townsend failed to report to the Back Gate for check out with his assigned squad. Lieutenant Copeland escorted Inmate Townsend from Inmate Townsend's assigned living area to the Back Gate. Inmates that miss their schedule check out time are transported to their assigned squad via State Vehicle. Lt. Copeland instructed Inmate Townsend to get onto the State Vehicle. Inmate Townsend complied with the instructions given by Lieutenant Copeland with assistance from Lt. Copeland by holding Inmate Townsend's arm as Inmate Townsend boarded the truck. When the vehicle pulled off, Inmate Townsend jumped from the rear of the vehicle. Lt. Copeland returned Inmate Townsend to the Back Gate Sallyport area. Lt. Copeland advised Inmate Townsend that Inmate Townsend would be receiving disciplinary action for violation of Rule #56 – Failure to Obey a Direct Order of a DOC Official and Rule #62 – Intentionally Creating a Security, Safety or Health Hazard.

I was called to the Backgate by Lieutenant Willie Copeland to transport Inmate Townsend to the farm and was the driver of the truck.

To my knowledge, the above-related facts are the entirety of my involvement with Inmate Townsend concerning the allegations on which his complaint is based.

I deny that I have violated any well-established civil rights of Inmate Townsend.

  
JIMMY TAUNTON

SWORN TO and SUBSCRIBED before me this 23 day of October 2006.

Annie Latimore  
NOTARY PUBLIC

12/06/2008  
My Commission Expires: